

FEB 23 2021

Nathan Ochsner, Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

UNITED STATES OF AMERICA

v.

RICARDO SANCHEZ
CIPRIANO VARGAS

§
§
§
§
§
§

Criminal No.

M-21-472

SEALED INDICTMENT

THE GRAND JURY CHARGES:

Count One

From on or about August 17, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

RICARDO SANCHEZ
and
CIPRIANO VARGAS

did knowingly and intentionally together and with other persons both known and unknown to the Grand Jury, willfully and unlawfully seize, confine, inveigle, decoy, kidnap, abduct, carry away and hold for ransom, reward or otherwise David Santos and, in committing or in furtherance of the commission of the offense, did use any means facility, or instrumentality of interstate or foreign commerce, namely, a cellular phone, in committing or in furtherance of the offense.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

Count Two

On or about August 17, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

RICARDO SANCHEZ
and
CIPRIANO VARGAS

with the intent to cause death and serious bodily harm, did take or attempt to take a motor vehicle, that is, a BMW 3 Series, that had been transported, shipped, and received in interstate commerce and foreign commerce from the person and presence of David Santos, by force, violence, and intimidation.

In violation of Title 18, United States Code, Section 2119.

Count Three

On or about August 17, 2020, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**RICARDO SANCHEZ
and
CIPRIANO VARGAS**

aiding and abetting others, did knowingly carry a firearm, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, Kidnapping in violation of Title 18 United States Code Section 1201(a)(1) and Carjacking in violation of Title 18, United States Code, Section 2119.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

A TRUE BILL

FOREPERSON

RYAN K. PATRICK
UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY